

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

SCOTT TURNAGE, CORTEZ D. BROWN,
DEONTAE TATE, JEREMY S. MELTON,
ISSACCA POWELL, KEITH BURGESS,
TRAVIS BOYD, TERRENCE DRAIN, and
KIMBERLY ALLEN on behalf of themselves
and all similarly situated persons,

Plaintiffs,

v.

Case No. 2:16-cv-02907-SHM-tmp

BILL OLDHAM, FLOYD BONNER, JR.,
ROBERT MOORE, KIRK FIELDS,
CHARLENE MCGHEE, REGINALD
HUBBARD, DEBRA HAMMONS, TIFFANY
WARD, SHELBY COUNTY, TENNESSEE,
TYLER TECHNOLOGIES, INC.,
GLOBALTEL*LINK CORPORATION,
SOFTWARE AG CLOUD AMERICAS, INC.
and SIERRA-CEDAR, INC.

Defendants.

**DEFENDANT SIERRA-CEDAR, INC.'S UNOPPOSED MOTION FOR EXTENSION OF
TIME TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFFS' FOURTH
AMENDED CLASS ACTION COMPLAINT AND MEMORANDUM IN SUPPORT**

Comes now Defendant, Sierra-Cedar, Inc., (hereafter "Sierra-Cedar") and hereby respectfully requests, pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), that this Court extend Sierra-Cedar's deadline to answer or otherwise respond to Plaintiffs' Fourth Amended Class Action Complaint through and including March 8, 2019. In support of the instant motion, Defendant states the following:

1. Sierra-Cedar's counsel, Kevin D. Bernstein and Albert G. Mclean, were only recently retained to represent Sierra-Cedar and have reviewed the Fourth Amended Complaint which for the first time in this case asserts a claim against Sierra-Cedar and thus brings Sierra-Cedar into the case as a defendant.

2. Pursuant to Rule 12, Sierra-Cedar's deadline to plead or otherwise respond to the Fourth Amended Complaint is Wednesday, February 13, 2019. Counsel for Plaintiffs have stated that they are unopposed to a twenty-three (23) day extension of time for Sierra-Cedar to plead or otherwise respond to the Fourth Amended Complaint, which would make Sierra-Cedar's extended deadline March 8, 2019, to plead or otherwise respond to the Fourth Amended Complaint.

3. Sierra-Cedar submits that good cause exists for the requested extension so that Sierra-Cedar can analyze the Court's docket, which spans one hundred fifty-seven (157) docket entries, and the fifty (50) page, one hundred seventy-seven (177) paragraph Fourth Amended Complaint to determine the appropriate procedural vehicle to respond and formulate an appropriate responsive pleading.

4. Sierra-Cedar further submits that this motion is not made for the purpose of delay and that Plaintiffs will not be prejudiced by the requested extension.

WHEREFORE, Sierra-Cedar respectfully requests that this unopposed motion for extension of time to plead or otherwise respond to the Fourth Amended Complaint be granted and that Sierra-Cedar be allowed an extension of time through and including March 8, 2019, within which to respond to the Fourth Amended Complaint. Sierra-Cedar requests such further and additional relief as may be appropriate and just.

Respectfully submitted,

SPICER RUDSTROM, PLLC

Attorneys for Defendant,
Sierra-Cedar, Inc.

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CERTIFICATE OF CONSULTATION

Pursuant to Local Rule 7.2 (a)(1)(B), by telephonic communication today, the undersigned counsel has been advised by William Burns and Michael McLaren, counsel for Plaintiffs, regarding the relief requested in this motion, that Plaintiffs are unopposed to a 23-day extension of time for Sierra-Cedar to plead or otherwise respond to the Fourth Amended Complaint, which makes the deadline for Sierra-Cedar to plead or otherwise respond to the Fourth Amended Complaint, March 8, 2019;.

/s/ Albert G. McLean
Albert G. McLean

CERTIFICATE OF SERVICE

I hereby certify that a copy of this motion and memorandum has been served on all counsel of record via the Court's ECF system, on this 11th day of February, 2019, who are as follows:

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